

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE WELLS
)	
v.)	
)	
SAP AMERICA, INC., et al.)	
)	
Defendants.)	
)	

**RESPONSE OF SAP AMERICA, INC. AND SAP AG TO
PLAINTIFF'S OBJECTIONS TO DEFENDANTS' TRIAL WITNESS LIST**

SAP hereby responds to the objections stated by Hodell to SAP's Trial Witness List. *See* ECF No. 216.

1. Hodell's objection numbers 1 through 4 and 5 through 9 are general objections to which no response is necessary.
2. As to Hodell's objection number 5 concerning the testimony of Michael Lovelace and Jay Sheldon, this is addressed by SAP in response to Plaintiff's Motion *in Limine* to Preclude Introduction of Issues Raised By Plaintiff During Other ERP Implementations, which is incorporated herein by reference.

Respectfully submitted,

/s/ Gregory J. Star
Michael J. Miller (admitted *pro hac vice*)
Gregory J. Star (admitted *pro hac vice*)
Drinker Biddle & Reath LLP
One Logan Square, Suite 2000
Philadelphia, PA 19103-6996
Telephone: (215) 988-2700
Facsimile: (215) 988-2757
Attorneys for SAP America, Inc. and SAP AG

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 2014, a copy of the foregoing Response of SAP America, Inc. and SAP AG to Plaintiff's Objections to Defendants' Trial Witness List has been filed via ECF and a copy is also being sent via First Class Mail pursuant to Fed. R. Civ. P. 5(b)(2)(F) to the following:

LSI-Lowery Systems, Inc.
c/o Timothy K. Kellett
911 Washington Ave., Suite 400
St. Louis, MO 63101

IBIS Group, Inc.
c/o Dale Van Leeuwen
1800 W. Hawthorne Lane, Suite N
West Chicago, IL 60185

/s/ Gregory J. Star
Gregory J. Star (admitted *pro hac vice*)